

**EXHIBIT “L”**

**Exhibit "L"**

**Excerpt of Defendants' First Request for Production of Documents  
with Plaintiff's Responses**

**Request No. 2:**

All financial records and statements concerning the Contract including, but not limited to:

- a) records and statements of funds generated by Contract mailings;
- b) records and statements of funds received by the Plaintiff for performing under the Contract;
- c) records and statements of the Plaintiff's out-of-pocket expenses incurred under the Contract;
- d) records and statements of payments made by the Shriners to the Plaintiffs to reimburse the Plaintiffs for their out-of-pocket expenses;
- e) records and statements of funds paid to the Shriners; and
- f) records and statements of postage paid for mailings on behalf of the Shriners.

**Response No. 2**

This Request is objected to in its entirety on the grounds asserted in the foregoing General Objections.

**Request No. 7:**

All contracts that were the subject of the claims in the underlying action.

**Response No. 7:**

This Request is objected to in its entirety on the grounds asserted in the foregoing General Objections.

**Request No. 9:**

All registration statements filed by the Plaintiff in any jurisdiction concerning the amounts of money collected by Vantage under the Contract.

**Response No. 9:**

This Request is objected to in its entirety on the grounds asserted in the foregoing General Objections.

**Request No. 10:**

All registration statements filed by the Plaintiff in any jurisdiction concerning the net amount of proceeds received by the Shriners as a result of the Contract.

**Response No. 10:**

This Request is objected to in its entirety on the grounds asserted in the foregoing General Objections.

**Request No. 11:**

All pleadings, motions, affidavits, discovery responses and other documents the Plaintiff filed or served in the underlying action.

**Response No. 11:**

This Request is objected to in its entirety on the grounds asserted in the foregoing General Objections. This Request is further objected to on the grounds that state and federal tax returns are privilege and exempt from discovery.

**Request No. 13:**

The Plaintiff's federal income tax returns for the five (5) years starting with 1998 and concluding with 2002, including all schedules and attachments thereto.

**Response No. 13:**

Subject to, and as limited by, the foregoing General Objections, Plaintiff will produce documents responsive to this Request.

**Request No. 18:**

All contracts, memoranda, letters, or other documents concerning any payments, goods or services that the Plaintiff provided to the Shriners at any time, including, but not limited to, charitable contributions to the Shriners by the Plaintiff or any charitable foundation in any way affiliated with or related to the Plaintiff.

**Response No. 18:**

This Request is objected to in its entirety on the grounds asserted in the foregoing General Objections.

**Request No. 20:**

All mail schedules that the Plaintiff prepared for the Shriners.

**Response No. 20:**

This Request is objected to in its entirety on the grounds asserted in the foregoing General Objections.

**Request No. 21:**

All budgets the Plaintiff prepared and submitted to the Shriners concerning mailings made pursuant to the Contract.

**Response No. 21:**

This Request is objected to in its entirety on the grounds asserted in the foregoing General Objections.

**Request No. 22:**

All invoices concerning any goods or services, including but not limited to paper, printing, cover letters, couriers, envelopes, reply envelopes, lettershop, address mail labels, back-end data processing, and front-end premiums in connection with the mailings made pursuant to the Contract.

**Response No. 22:**

This Request is objected to in its entirety on the grounds asserted in the foregoing General Objections.

**Request No. 23:**

All checks the Plaintiffs used to pay the invoices requested in Request No. 22.

**Response No. 23:**

This Request is objected to in its entirety on the grounds asserted in the foregoing General Objections.

**Request No. 24:**

All checks used to pay postage for any mailings made pursuant to the Contract.

**Response No. 24:**

This Request is objected to in its entirety on the grounds asserted in the foregoing General Objections.

**Request No. 25:**

All documents concerning the amounts of contributions made in response to the Plaintiff's mailings.

**Response No. 25:**

This Request is objected to in its entirety on the grounds asserted in the foregoing General Objections.

**Request No. 26:**

All documents concerning the number of donors who made contributions in response to the Plaintiff's mailings.

**Response No. 26:**

This Request is objected to in its entirety on the grounds asserted in the foregoing General Objections.

**Request No. 29:**

Any minutes of company meetings concerning the Plaintiff created from January 1, 1999 to the present.

**Response No. 29:**

This Request is objected to in its entirety on the grounds asserted in the foregoing General Objections.

**Request No. 31:**

All summaries created by the Plaintiff concerning the fundraising programs that were the subject of claims in the underlying litigation, including, but not limited to, summaries entitled "Vantage Program Contract Summaries" and "Vantage Contract Summary Combined".

**Response No. 31:**

This Request is objected to in its entirety on the grounds asserted in the foregoing General Objections.

**Request No. 32:**

All Response Analysis Reports that the Plaintiff created concerning the Contract.

**Response No. 32:**

This Request is objected to in its entirety on the grounds asserted in the foregoing General Objections.

**Request No. 33**

All documents concerning any agreements to provide fundraising consulting and management services, or similar services, between the Plaintiff and the United States Navy Memorial Foundation, including, but not limited to, any drafts of such agreement, regardless of whether the Plaintiff ultimately entered into such agreement with the U.S. Navy Memorial Foundation.

**Response No. 33:**

This Request is objected to in its entirety on the grounds asserted in the foregoing General Objections.

**Request No. 34**

All documents concerning any agreements to provide fundraising consulting and management services, or similar services, between the Plaintiff and the Order of the Sons of Italy in America Foundation, including, but not limited to, any drafts of such agreement, regardless of whether the Plaintiff ultimately entered into such agreement with the Order of the Sons of Italy in America Foundation.

**Response No. 34:**

This Request is objected to in its entirety on the grounds asserted in the foregoing General Objections.

**Request No. 35**

All documents concerning all bank accounts maintained by the Plaintiff, including, but not limited to, any related entities as specified in definition no. 4 above, for the period January 1, 1999 through the present.

**Response No. 35:**

This Request is objected to in its entirety on the grounds asserted in the foregoing General Objections.

**Request No. 38**

All documents concerning mailing lists rented or exchanged for any of the mailings made under the contract.

**Response No. 38:**

This Request is objected to in its entirety on the grounds asserted in the foregoing General Objections.

**Request No. 39:**

Plaintiff's list rental and exchange registry.

**Response No. 39:**

This Request is objected to in its entirety on the grounds asserted in the foregoing General Objections.

PABOS2:MJGRIFF:609751\_1  
14794-90433